

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

ASHLEY ALBERT, et al.,

Plaintiffs,

CIVIL ACTION NO. 8:20-CV-1936

v.

GLOBAL TEL*LINK CORP., et al.,

Defendants.

JOINT MOTION TO MODIFY BRIEFING SCHEDULE

Pursuant to Local Rule 105.9, Defendants Securus Technologies, LLC, Global Tel*Link Corp., and 3Cinteractive Corp., and Plaintiffs Ashley Albert, Ashley Baxter, Karina Jakeway, and Melinda Jabbie, through counsel, respectfully move this Court to enlarge the briefing schedule as below related to Plaintiffs' Motion to Amend Or For Partial Final Judgment Or Interlocutory Appeal (ECF No. 103), to account for existing deadlines, scheduling conflicts, and the Thanksgiving holiday. Pursuant to Local Rule 105.1, a proposed order accompanies this motion.

Event	Existing Deadline	Proposed Deadline
All Defendants' Responses to Plaintiffs' Motion to Amend or Partial Final Judgment or Interlocutory Appeal	November 12, 2021	November 22, 2021
Plaintiffs' Reply to Their Motion to Amend or Partial Final Judgment or Interlocutory Appeal	November 26, 2021	December 16, 2021

[signatures on following page]

Dated: November 4, 2021

Respectfully submitted,

/s/ Matthew K. Handley

HANDLEY FARAH & ANDERSON PLLC
Matthew K. Handley (Bar No. 18636)
Rachel E. Nadas*
Stephen Pearson*
200 Massachusetts Ave. NW
Seventh Floor
Washington, DC 20001
T: 202.559.2433
mhandley@hfajustice.com
rnadas@hfajustice.com

(Signed by Jason R. Scherr with permission)

George F. Farah*
Rebecca P. Chang*
33 Irving Place
New York, NY 10003
T: 212.477.8090
gfarah@hfajustice.com
rchang@hfajustice.com

William H. Anderson
4730 Table Mesa Drive, Suite G-200
Boulder, CO 80305
T: 202.559-2433
wanderson@hfajustice.com

COHEN MILSTEIN SELLERS & TOLL PLLC
Benjamin D. Brown*
Brent W. Johnson*
Robert A. Braun*
1100 New York Ave., Suite 500
Washington, DC 20005
T: 202.408.4600
bbrown@cohenmilstein.com
bjohnson@cohenmilstein.com
rbraun@cohenmilstein.com

Respectfully submitted,

/s/ Jason R. Scherr

MORGAN, LEWIS & BOCKIUS LLP
Jason R. Scherr (Bar No. 25633)
1111 Pennsylvania Avenue NW
Washington, DC 20004-2541
T: 202.373.6709
F: 202.373.6460
jr.scherr@morganlewis.com

Elizabeth Herrington
77 W. Wacker Drive
Chicago, IL 60601
T: 312.324.1000
F: 312.324.1001
beth.herrington@morganlewis.com

R. Brendan Fee*
1701 Market Street
Philadelphia, PA 19103
T: 215.963.5000
F: 215.963.5001
brendan.fee@morganlewis.com

*Attorneys for Defendant Securus
Technologies, LLC*

/s/ Jonathan Pitt

WILLIAMS & CONNOLLY LLP
Jonathan B. Pitt (Bar No. 16086)
Colette T. Connor*
725 Twelfth Street N
Washington, DC 20005
T: 202.434.5000
F: 202.434.5029
jpitt@wc.com
cconnor@wc.com

(Signed by Jason R. Scherr with permission)

Counsel for Defendant 3CInteractive Corp.

Christopher J. Bateman*
88 Pine Street, 14th Floor
New York, NY 1005
T: 212.838.7797
cbateman@cohenmilstein.com

JUSTICE CATALYST LAW, INC.
Janet Herold*
Benjamin D. Elga*
123 William Street, 16th Floor
New York, NY 10038
T: 518.732.6703
jherold@justicecatalyst.org
belga@justicecatalyst.org

HUMAN RIGHTS DEFENSE CENTER
Daniel Marshall*
P.O. Box 1151
Lake Worth, FL 33460
T: 561.360.2523
dmarshall@hrdc-law.org

WASHINGTON LAWYERS' COMMITTEE FOR
CIVIL RIGHTS AND URBAN AFFAIRS
Hannah E.M. Leiberman
700 14th St. NW, Ste. 400
Washington, DC 20005
T: 202.319.1040
hannah_leiberman@washlaw.org

Counsel for Plaintiffs

* admitted *pro hac vice* or *pro hac vice* forthcoming

/s/ Jonathan I. Gleklen
ARNOLD AND PORTER KAYE SCHOLER LLP
Jonathan I. Gleklen (Bar No. 21350)
601 Massachusetts Ave. NW
Washington, DC 20001-3743
T: 202.942.5000
F: 202.942.5999
jonathan.gleken@arnoldporter.com

(Signed by Jason R. Scherr with permission)

Charles Scott Lent*
Javier Ortega*
250 West 55th Street
New York, NY 10019-9710
T: 212.836.8000
F: 212.836.8689
scott.lent@arnoldporter.com
Javier.ortega@arnoldporter.com

*Counsel for Defendant Global Tel*Link Corp*